

# **SANGAMON COUNTY EMERGENCY TELEPHONE SYSTEM DEPARTMENT**

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1305 S. 9<sup>th</sup> St., Springfield, Illinois 62703 Tel (217) 753-6839 Fax (217) 753-6372

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**Mallorie F. Teubner, ENP**  
**Executive Director**

**Emergency Telephone System Board**

Joe Powell, Chairman  
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February 15, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WT Docket 94-102

Dear Ms. Dortch,

I am writing this letter on behalf of my Board, and on behalf of my county-wide Public Safety Answering Point (PSAP), the Sangamon County Central Dispatch System (SCCDS), in support of the supplemental filing by the Association of Public-Safety Communications Officials – International, Inc. dated February 4, 2005, reference the “Request for Declaratory Ruling” filed October 6, 2004.

SCCDS is a multi-jurisdictional 9-1-1 and emergency communications center for 52 police, fire, and EMS agencies within the borders of Sangamon County, including the Illinois state capitol, Springfield. We have been receiving wireless 9-1-1 calls since the early 90's. We began handling wireless Phase I calls in 2001, and shortly thereafter, Phase II calls. Our citizens expect that we can locate them in an emergency based upon the Phase II data we receive from the wireless carriers.

Our Emergency Telephone System Board spent considerable staff-hours and money to deploy Phase II capabilities, and are in the process of upgrading our 9-1-1 premise equipment and mapping solutions to provide our dispatchers with tools that will make locating callers easier. This equipment is very expensive, but the Board feels the expenditures are justified given the public's expectation that we are able to locate them, no matter where they are.

Illinois is a very large state with huge variations in population density and terrain. To base the accuracy requirements for wireless 9-1-1 over the entire state will negatively impact the areas with the highest call volume and the greatest dependency on wireless access for emergency services. If we do not require wireless carriers to determine their accuracy in our area, which varies between dense population and very rural areas, we

will be compromising our ability to find our citizens when they need it most. It also means the expenses we incurred, and continue to incur, to purchase the technology to meet the FCC accuracy guidelines are excessive.

Please help us meet our citizens' expectations and provide the level of service they deserve.

Sincerely,

Mallorie F. Teubner, ENP  
Executive Director

Sangamon County Emergency Telephone System Department  
Sangamon County Central Dispatch System  
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cc: Edward Thomas  
John Muleta  
Sangamon County Emergency Telephone System Board